



Complaint Seeking Declaratory Judgment (the “Motion to Dismiss”) and respectfully state as follows:

1. For the reasons set forth in Defendants’ Brief in Support of Defendants’ Motion to Dismiss Plaintiff’s Complaint, Defendants respectfully request that the Court, pursuant to Rule 12(b)(1) of the Federal Rules of Civil Procedure, grants the Motion to Dismiss and dismisses Plaintiff, Atlantic Casualty Insurance Company’s declaratory judgment action.

Respectfully submitted,

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By: /s/ J. Chad Gauntt

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**CERTIFICATE OF SERVICE**

Pursuant to the Federal Rules of Civil Procedure, a copy of this document was served on Plaintiff's counsel on August 28, 2019.

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